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*I will look at it*

*Colleen McMahon*  
2/27/15

**By ECF and Hand Delivery**

The Honorable Colleen McMahon  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: Maricultura del Norte, S. de R.L. de C.V., et al. v. World Business Capital, Inc., et al., 14 Civ. 10143 (CM) (KNF)

Dear Judge McMahon:

I write on behalf of defendants AMERRA Capital Management, LLC (“AMERRA”) and Craig A. Tashjian with respect to plaintiffs’ motion to disqualify Sidley Austin LLP, pursuant to the provision of Your Honor’s Rules (the “Rules”) that permits letter motions to Chambers in certain circumstances. Mindful that sur-replies generally are not permitted, defendants respectfully move the Court for an Order granting them a right to submit a brief sur-reply under the circumstances described below.

Plaintiffs’ motion to disqualify Sidley was supported solely by an affidavit of Fernando Elías-Calles, asserting solely that an attorney-client relationship was established between Sidley and his clients (plaintiffs here) in February 2013. Following submission of opposing papers rebutting plaintiffs’ contention, plaintiffs’ reply filed on February 24 asserted for the first time that the alleged attorney-client relationship was instead established earlier, through communications in October-November 2012. Plaintiffs submitted a “supplemental” declaration by Mr. Elías-Calles that raised new matter and documents that were not the subject of their moving papers. Accordingly, defendants AMERRA and Mr. Tashjian respectfully request permission to submit a brief sur-reply in the form attached as Exhibit A, in order to respond to the new matter which plaintiffs did not previously bring before the Court.



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We are available for a telephonic or in-person conference if Your Honor wishes to discuss these matters with counsel. Thank you.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Alan M. Unger".

Alan M. Unger

Enclosures

cc: All Counsel